**Company Recordings Policy**

May 2018

**Purpose**

Daniel Thwaites Plc ("the Company") operates the following policy in relation to Company recordings for training and monitoring purposes. This policy applies to all employees of the Company.

Principles

The Company may, from time to time, record calls or video employees to:

* Improve the quality of the service;
* Identify individual training needs;
* Promote the brand via Social Media;
* Use as recruitment and marketing tools such as Company handbooks and the Company intranet.
* Protect the interest of our employees

Please note that this list is not exhaustive

**Notice**

Employees will be notified of any recordings prior to the commencement of each recording.

**Data Protection**

The Company is committed to all aspects of data protection and takes seriously its duties, and the duties of its employees, under the General Data Protection Regulation 2018. Video and audio recordings of employees will be considered to be personal data for the purposes of the General Data Protection Regulation 2018. Please see the our General Data Protection Regulation Policy for further details of how the Company deals with personal data, including personnel files and data subject access requests, and employees' obligations in relation to personal data.

Video and audio recordings of employees will be retained for a period of no longer than 12 months, and recordings will only be used for the purposes specified in this policy.

We shall ensure that the use of these recordings is fair and that we comply with the requirements of the relevant legislation.

This includes:

* The Regulation of Investigatory Powers Act 2000;
* The Telecommunications (Lawful Business Practice) (Interception of Communications Regulations) 2000;
* The Telecommunications (Data Protection and Privacy) Regulations 1999;
* The General Data Protection Regulation 2018; and
* The Human Rights Act 1998.

**Collecting information**

Personal data collected in the course of recording activities will be processed fairly and lawfully in accordance with the Data Protection Act 1998. It will be:

* Adequate, relevant and not excessive;
* Used for the purpose(s) stated in this policy only and not used for any other purposes;
* Accessible only to managerial staff;
* Treated confidentially;
* Stored securely; and
* Not kept for longer than necessary and will be securely destroyed once the issue(s) in question have been resolved.